

Anti-Bribery and Anti-Corruption

Part 1/2

We do not offer, give, accept or request benefits of any type, including gifts, hospitality, donations or sponsorships, that are intended to inappropriately influence decisions or that are outside policy limits.

Why is it important?

Bribery and corruption harm communities, damage our reputation, undermine trust, are illegal, and may result in severe consequences, including fines, imprisonment and loss of business. Excessive, unreasonable or frequent gifts and hospitality expenses give the appearance that our success is being bought, rather than built. Acting with integrity in all interactions helps protect both me and TMICC.

What must I do?



- Do not offer or give anything of value or any advantages, including **Facilitation Payments**, to anyone, which are, or give the impression that they are, intended to improperly influence decisions about TMICC or to give TMICC an improper advantage.
 - **An exception** applies if my freedom or physical safety is in danger. I must disclose those circumstances to Business Integrity as soon as practical after the threat ends.
 - **A bribe** is not allowed even if I pay for it with my own money.
 - **Facilitation Payments** are small amounts made to a low-level government employee to secure or expedite the performance of a routine or necessary action to which TMICC is entitled. They are not allowed, except in rare circumstances pre-approved by the Chief Business Integrity Officer.
- Maintain integrity by refusing bribes, anything of value, or any advantages from any **third party*** that could influence improperly the way TMICC makes decisions or my own objectivity and impartiality.
- Follow all TMICC **third party*** and finance processes, such as those for onboarding third parties, conducting diligence on third parties, raising purchase orders, and offering / receiving discounts.
- Include in **third party*** contracts clauses that advise third parties of their obligations to comply with applicable anti-corruption and anti-bribery laws, give TMICC rights to audit the third parties' books and records related to their TMICC business, require the third parties to cooperate fully and truthfully in any audit or investigation by TMICC, and allow TMICC the right to terminate the contract if we have a reasonable belief that the **third party*** is engaged in corruption, bribery, conflicts of interest or other fraud.

*A third party is any entity with whom we have a financial relationship. Certain third parties create greater risk than others, and our processes are risk-based.

Anti-Bribery and Anti-Corruption

Part 2/2

Our Gifts and Hospitality Standard

- **Report** any suspected or actual breaches as set out in Our Code, including any requests for a bribe or other benefit by any Public Official* or other third party with whom TMICC does business.
 - Ensure all gifts and hospitality are for legitimate business purposes, proportionate, occasional, and within limits, whilst avoiding cash or equivalents, like gift cards, loans, shares, hotels or other travel benefits.
 - **Use** reasonably priced TMICC-branded gifts or ice-cream coupons (within Gift limits) in lieu of other gifts.
- **Report** any gifts and hospitality that are above these limits to the Business Integrity Team.
 - Decline any gift or hospitality that is outside of the limits set in this Gifts and Hospitality Standard, unless an exception has been approved through the **Disclosure Tool**.

Gifts 	Hospitality 		
ALL WL	WL 1 & 2	WL 3 & 4	WL 5+
€30	€60	€120	€300



Where do I go for more information?

Business Integrity Officer, Global Policy Portal, or Gifts or Hospitality Disclosure Tool.



*A Public Official is an employee of local, national or international government agencies, or government-owned or controlled entities. This term also includes a member of a political party or royal family, a candidate for political office, and an employee of a public international organisation, such as the UN, WTO or UNICEF.

